

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

v.

AMOR DE JESUS CORP., et al.,

Defendants.

CASE NO.: 23-CV-24299

MOTION FOR PROTECTIVE ORDER

COMES NOW, Defendant, ZELMIRA QUINONES, personally and on behalf of corporate representative of Sweet Living, by and through the undersigned counsel, and file this her Motion for Protective Order and as grounds in support thereof states as follows:

1. On March 6, 2024, undersigned counsel's, and the assistant for counsel for Plaintiff mutually coordinated the deposition for Defendant Zelmira Quinones for April 25, 2024. This was followed by a filing of Plaintiff's Notice of Taking Deposition filed on March 7, 2024 (*Attached as Composite Exhibit 1*).
2. On March 11, 2024, undersigned counsel's assistant received an email from counsel for Plaintiff's, Brian Pollock, that earlier dates were needed (*see attached email as Exhibit 2*) and undersigned counsel, as a courtesy, agreed to accommodate his request with time constraints due to undersigned counsel's conflicts with other cases. Defendant, Zelmira Quinones's deposition was then scheduled for April 15, 2024, from 9 am to 12 noon. (*See attached Exhibit 3*).
3. On April 8, 2024, undersigned counsel received an email from Judge Becerra's chambers rescheduling a court proceeding in a criminal case for April 15, 2024, in the matter of USA v. Medina, Case Number 24-20052. Undersigned counsel's assistant

immediately notified counsel for Plaintiff advising of the need to reschedule the deposition. (*See email attached as Exhibit 4*).

4. The matter now set by Judge Becerra for April 15, 2024, is a criminal matter which takes precedent and involves the liberty of an individual. While this matter involves a Plaintiff alleging she was not fully paid from years ago. While Plaintiff is definitely entitled to her case proceedings, the case before Judge Becerra, at this time, is a time pressing issue which is much more important.
5. Counsel for Plaintiff has refused to cancel and/or reschedule.
6. Undersigned counsel has attempted to resolve this matter with counsel for Plaintiff multiple times to no avail. (*See attached communications attached as composite Exhibit 5*).
7. Undersigned counsel, again as a courtesy, even rescheduled the deposition of Plaintiff to a later date to allow Plaintiff's counsel to take the deposition of Defendant as counsel for Plaintiff claimed the depositions of Defendants must take place first. (*See attached Re-Notice of Taking Deposition of Plaintiff attached as Exhibit 6*).
8. While this is an administrative matter that should be easily resolved between the assistants for counsel, Plaintiff's counsel capricious position has forced undersigned counsel seeking Court intervention wasting the Court's time with what ought to be a non-issue.
9. Undersigned counsel has, at every point, been courteous and accommodated counsel for Plaintiff and the professional courtesies have been just one sided.
10. Defendant, Zelmira Quinones and undersigned counsel remain willing to appear for deposition at a mutually convenient time when undersigned counsel is available.

11. This is a good faith request and not for dilatory purposes.

WHEREFORE, Defendant respectfully requests that this Honorable Court grant this motion and whatever other relief it deems just and reasonable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served via EM/ECF to all listed persons receiving notice on this 11th day of April 2024.

EMMANUEL PEREZ & ASSOCIATES, P.A.
901 Ponce De Leon Blvd, Suite 101
Coral Gables, FL 33134
Tel. (305)442-7443
eService: courtmail@lawperez.com

By: /s/Emmanuel Perez
EMMANUEL PEREZ
F.B.N. 586552

From: Deishaly Morales <dmorales@fairlawattorney.com>
Sent: Wednesday, March 06, 2024 12:09 PM
To: Assistant <assistant@lawperez.com>
Cc: Brooks LaRou <brooks@fairlawattorney.com>
Subject: Re: Maria Elena Chavez Letona vs. Amor de Jesus, Corp, Jose Machado, Zelmira Quinonez, & Aminta Quinonez

Good afternoon Ms. Reyes,

Thank you for providing the proposed dates, our office is available on April 25th for both depositions. Please be advised the depositions will be about 4 hours long each, as follows: 1st deponent from 9am-1pm and 2nd deponent from 2pm-6pm. Please be so kind as to confirm which deponent will be attending which deposition for us to provide you with the corresponding notices.

If you have any questions or concerns, please do not hesitate to contact our office.

Best Regards,

Deishaly Morales | Legal Assistant
FairLaw Firm
135 San Lorenzo Ave
Suite 770
Coral Gables, FL 33146
Dir: 786.408.7275
Ofc: 305.230.4884
Fax: 305.230.4884
dmorales@fairlawattorney.com
www.fairlawattorney.com

On Mar 6, 2024, at 11:53 AM, Assistant <assistant@lawperez.com> wrote:

Good morning,

Mr. Perez is available the following days for both depositions:

- Thursday, April 25
- Wednesday, May 1
- Wednesday, May 8

Please let me know which date works best for you. Thank you!

Kind regards,

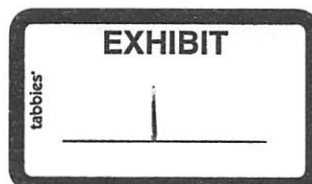
Olivia Reyes

email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com

<image001.gif>

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Coral Gables, Florida 33134
Tel. 305.442.7443
Fax: 305.441.9218



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-CV-24299-MORENO/OTAZO-REYES

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP.,
SWEET LIVING FACILITY INC.,
JOSE MACHADO, ZELMIRA
QUINONEZ, AND AMINTA
QUINONEZ,

Defendants.

PLAINTIFFS' NOTICE OF TAKING DEPOSITION

TO: ALL COUNSEL LISTED BELOW

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, 45, and other applicable rules and laws, the undersigned attorney will take the deposition of:

NAME: Zelmira Quinonez

DATE AND TIME: April 25th, 2024 at 2:00 p.m.

PLACE: **Via Zoom (a link will be provided separately)**

upon oral examination before Universal Court Reporting, a Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Rules of Court. The deposition will continue from hour to hour and from day to day until completed, and will be video recorded by the same entity before whom the deposition is taken.

PLEASE GOVERN YOURSELF ACCORDINGLY.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by email and U.S. mail this 7th day of March 2024, which will serve Emmanuel Perez, Esq., LAW OFFICE OF EMMANUEL PEREZ & ASSOCIATES, P.A., 901 Ponce De Leon Blvd., Ste. 101, perez@lawperez.com, as Counsel for Defendants, and all others who appeared in this action.

s/ Patrick Brooks LaRou, Esq.
Patrick Brooks LaRou, Esq.
Fla. Bar No. 1039018
brooks@fairlawattorney.com
FAIRLAW FIRM
135 San Lorenzo Avenue, Suite 770
Coral Gables, FL 33146
Tel: (305) 230-4884
Counsel for Plaintiff

From: Brian Pollock <brian@fairlawattorney.com>

Sent: Monday, March 11, 2024 12:23 PM

To: Assistant <assistant@lawperez.com>

Cc: Juan Aragon <juan@fairlawattorney.com>; Brooks LaRou, Esq. <brooks@fairlawattorney.com>; Steffany Sanguino <steffany@fairlawattorney.com>; Deishaly Morales <dmorales@fairlawattorney.com>

Subject: Re: Maria Elena Chavez Letona vs. Amor de Jesus, Corp, Jose Machado, Zelmira Quinonez, & Aminta Quinonez - Request for Depositions

Discovery cut-off is April 26, so we're going to need dates other than the day before the discovery cut-off and one day the week before that. If you can't provide additional dates, then we'll advise the Court.

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Mar 11, 2024, at 12:17 PM, Assistant <assistant@lawperez.com> wrote:

The earliest date that Mr. Perez has available is April 19th at 1:00 PM. If you are available, we can attempt to schedule Jose Machado's Deposition that day, but we would have to check with our client to make sure he is also available.

April 25th is the second earliest date that Mr. Perez is available. So, I suggest we leave Aminta Quinonez and Zelmira Quinonez for that day, as we originally coordinated.

If you are not available those dates then please provide additional dates after April 25th. Thank you!

Kind regards,

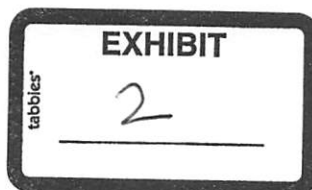
Olivia Reyes

email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com

<image001.gif>

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:23-CV-24299-MORENO/OTAZO-REYES

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP.,
SWEET LIVING FACILITY INC.,
JOSE MACHADO,
ZELMIRA QUINONEZ, AND
AMINTA QUINONEZ,

Defendants.

PLAINTIFF'S RE-NOTICE OF TAKING VIDEO DEPOSITION

TO: ALL COUNSEL LISTED BELOW

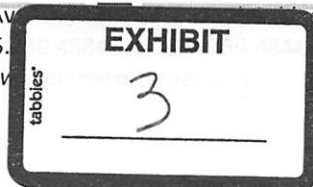
PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, 45, and other applicable rules and laws, the undersigned attorney will take the deposition of:

NAME: Zelmira Quinonez

DATE AND TIME: April 15, 2024 at 10:00 a.m.

PLACE: FAIRLAW FIRM
Via Zoom (See Instructions as Exhibit "A" Hereto)
Zoom Information To be Sent Separately

upon oral examination before Universal Court Reporting, a Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. This deposition is being taken for discovery, use at trial, or such other purposes as are permitted under the Rules of Civil Procedure. The deposition will continue from hour to hour and from day to day until



completed, not to exceed seven (7) hours, and will be video recorded by the same entity before whom the deposition is taken.

PLEASE GOVERN YOURSELF ACCORDINGLY.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was eFiled on this 12th day of March 2024, which will serve Emmanuel Perez, Esq., LAW OFFICES OF EMMANUEL PEREZ & ASSOCIATES, P.A., as *Counsel for Defendants*, percz@lawperez.com, 901 Ponce De Leon Blvd., Ste. 101, Coral Gables, FL 3134.

s/Brian H. Pollock, Esq.
Brian H. Pollock, Esq.
Fla. Bar No. 174742
brian@fairlawattorney.com
FAIRLAW FIRM
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
Tel: 305.230.4884
Counsel for Plaintiff

EXHIBIT “A”

1. The deponent must not use a virtual background during the Zoom deposition.
2. The deponent must comply with any request by a participant to show the environment where the deposition is taking place by using the camera on the device used by the witness for the deposition.
3. All deposition participants shall appear remotely unless the witness requests that the witness's counsel be present in the same physical location as the witness. The witness shall provide written notice to the participants no less than 5 business days before the deposition of the witness's intent to have his or her counsel present in the same physical location during the deposition. Upon such notice, any participant may attend the deposition in person or remotely, or reschedule the deposition to occur at the office of FairLaw Firm, 135 San Lorenzo Avenue, Suite 770, Coral Gables, Florida 33146. If the witness and the witness's counsel are in the same room, the witness and counsel must use two video cameras on two different devices and mute one of those devices to allow only one microphone to be used at a time. One video camera shall show the witness, and one video camera shall show the witness's counsel.
4. While testifying in the deposition, the witness shall not engage in any private communication, including but not limited to text messages, electronic mail, or the chat feature in the video conferencing system, while on the record, whether or not a question is pending. Nothing in this paragraph prohibits counsel for the deponent from conferring with the witness during a break in the deposition, in a “breakout room” or otherwise, nor does it prohibit counsel from communicating with each other by any means during the deposition, or otherwise prevent counsel for the deponent from conferring with the deponent as permitted by the applicable rules of court.
5. The deponent must not turn off his or her microphone while on the record. While on the record, the deponent shall close all documents, emails, browsers, programs, and applications on his or her computer or other device, other than the virtual video conference platform being used to take the deposition. While on the record, the witness should turn off all electronic devices capable of communication and Internet access other than the ones being used to connect to the remote deposition.

To: Assistant <assistant@lawperez.com>; Brian Pollock
<brian@fairlawattorney.com>; Brooks LaRou
<brooks@fairlawattorney.com>

Subject: Re: CHAVEZ LETONA V. AMOR DE JESUS DEPOSITIONS

Good morning,

Mr. Pollock is not available on both mornings, could you please provide more dates?

If you have any questions or concerns do not hesitate to contact our office.

Best Regards,

Juan Aragon | Legal Assistant to
Brian H. Pollock, Esq.
FairLaw Firm
Ofc: 305.230.4884
Fax: 305.230.4844
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
juan@fairlawattorney.com
www.fairlawattorney.com

On Mon, Apr 8, 2024 at 2:51 PM Assistant
<assistant@lawperez.com> wrote:

Good afternoon,

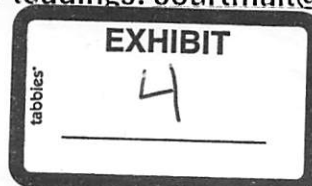
As you already know, Mr. Perez was pressed for time for the deposition scheduled on Monday April 15, 2024 (9 am - 12 noon) as he has a special set hearing at 1 pm. We just now received the email below rescheduling Mr. Perez for a hearing on Monday, at 12 noon which means Mr. Perez is no longer available. The hearing below is in person and cannot be continued or changed. Please let me know if you agree to reschedule to Thursday April 18 or Friday April 19 all morning. Thank you.

Kind regards,

Olivia Reyes

email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com



<image001.gif>

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Fax: 305.441.9218

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<image002.jpg> **Be environmentally aware - please do not print this e-mail unless you need to.**

From: Donna Gay-Johnson <Donna_D_Gay-Johnson@flsd.uscourts.gov>
Sent: Monday, April 08, 2024 4:21 PM
To: Courtmail <Courtmail@lawperez.com>; Ayer, Jessica (USAFLS) <Jessica.Ayer@usdoj.gov>
Subject: Freddy Railandy Medina Cruz 24cr20052 Change of Plea
Importance: High

Counsel – due to a conflict with the Court's schedule, the change of plea will be moved to Monday 4/15/24 at 12pm.

Thank You
Donna Gay-Johnson
donna_d_gay-johnson@flsd.uscourts.gov

Courtroom Deputy to The Honorable Judge Jacqueline Becerra
305-523-5931

Smile, breathe and go gently into your day!!!

LAW OFFICES OF EMMANUEL PEREZ

ATTORNEY AT LAW
901 PONCE DE LEON BLVD.
SUITE 101
CORAL GABLES, FLORIDA 33134

TELEPHONE: (305) 442-7443

FACSIMILE: (305) 441-9218

April 10, 2024

Brian Pollock, Esquire
Via email

RE: CHAVEZ LETONA VS. AMOR DE JESUS ET AL
CASE NO: 23-24299

Dear Mr. Pollock:

I am in receipt of several emails you have sent my assistant regarding the deposition of Zelmira Quinones, and this shall serve as a response to same.

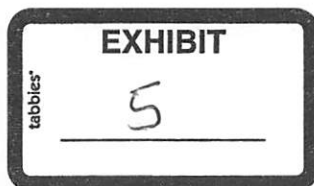
As you have been informed, I am scheduled to be in front of Judge Becerra in the case of USA v. Medina on Monday, April 15, 2024, and, as such, the deposition of my client, Zelmira Quinones, cannot proceed on that same day.

In your email of April 10, you state as follows:

“We also requested but did not receive dates to depose the corporate representatives of Amor de Jesus and Sweet Living Facility, unless the individuals who we will be deposing will be the representatives, and to reiterate, we don’t agree to any limitations on the length of time we can depose each Defendant other than as provided by the Rules of Civil Procedure (i.e., up to 7 hours each). Lastly, please advise if an interpreter is required for any of the deponents.”

First, we informed your office that Zelmira Quinones and Aminate Quinones were the respective corporate representatives. In fact, attached please find an email from your office dated MARCH 11 thanking my assistant for that information. (*Exhibit A*)

You further make a statement regarding time limitations. The limitation imposed by me refer ONLY to the time I am available. If you want 7 hours per Defendant, that’s fine but it’s not going to happen on the dates you have set simply because I have other scheduled proceedings, some Ordered by Court. Attached please find my assistant’s email to you dated MARCH 14 advising of my time limitation. (*Exhibit B*).



Mr. Pollock
April 10, 2024
Page 2

Lastly, you again ask about an interpreter when your office has asked this numerous times and we have answered numerous times. Attached is one of the emails confirming all 3 deponents need translators dated MARCH 13. (*Exhibit C*).


I remind you that Zelmira Quinones was initially scheduled for April 25 which I agreed to reschedule as a courtesy to you. Again, as a courtesy to you, I agreed and rescheduled the deposition of the Plaintiff to April 25.

A short continuance of the deposition does not prejudice your client and your refusal to reschedule the deposition is capricious. It is a waste of time and resources to seek Court intervention, but your stand compels me to do so.

My assistant has provided dates to you many times and here they are again in the event you wish to consider same:

APRIL 18	ALL DAY	YOU SAID YOU ARE NOT AVAILABLE
APRIL 19	9 AM	
APRIL 29	2 PM	
MAY 2	ALL DAY	
MAY 3	ALL DAY	

Sincerely,



EMMANUEL PEREZ

Assistant

From: Assistant
Sent: Monday, March 11, 2024 11:48 AM
To: juan@fairlawattorney.com; Brian Pollock; Brooks LaRou; Steffany Sanguino
Cc: Deishaly Morales
Subject: RE: Maria Elena Chavez Letona vs. Amor de Jesus, Corp, Jose Machado, Zelmira Quinonez, & Aminta Quinonez - Request for Depositions
Attachments: Notice of Deposition Aminta Quinonez (Chavez Letona) 3.7.24.pdf; Notice of Deposition Zelmira Quinonez (Chavez Letona) 3.7.24.pdf

Good morning,

We already coordinated the Depositions for Zelmira Quinonez and Aminta Quinonez with Deishaly Morales. Aminta's Deposition is scheduled for April 25, 2024 at 9:00 AM and Zelmira's Deposition is scheduled for April 25, 2024 at 2:00 PM. Attached please find the notices that were provided to us.

As for Amor de Jesus and Sweet Living Facility, Zelmira Quinonez is the Rep for Sweet Living Facility and Aminta Quinonez is the Rep for Amor de Jesus. As mentioned before, their depositions are already scheduled.

As for the Deposition of Jose Machado, Mr. Perez is not available those days. Please provide additional dates. Thank you!

Kind regards,

Olivia Reyes

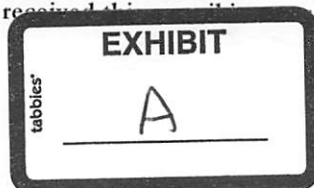
email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com



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From: Juan Aragon <juan@fairlawattorney.com>



Sent: Monday, March 11, 2024 11:52 AM

To: Assistant <assistant@lawperez.com>

Cc: Brian Pollock <brian@fairlawattorney.com>; Brooks LaRou <brooks@fairlawattorney.com>; Steffany Sanguino <steffany@fairlawattorney.com>; Deishaly Morales <dmorales@fairlawattorney.com>

Subject: Re: Maria Elena Chavez Letona vs. Amor de Jesus, Corp. Jose Machado, Zelmira Quinonez, & Aminta Quinonez - Request for Depositions

Good morning Counsel,

We would like to reschedule the depositions of Zelmira Quinonez and Aminta Quinonez to an earlier date. Thank you for letting us know Zelmira Quinonez and Aminta Quinonez will serve as the corporate representatives of their respective companies. Additionally, please see below the new available dates.  

Proposed dates:

these depositions will be set to commence at 10:00 a.m via zoom

- April 2nd
- April 10th
- April 15th
- April 16th (starting at 11am)
- April 17th
- April 19th

If you have any questions or concerns do not hesitate to contact our office.

Best Regards,

Juan Aragon | Legal Assistant to
Brian H. Pollock, Esq.

FairLaw Firm

Ofc: 305.230.4884

Fax: 305.230.4844

135 San Lorenzo Avenue

Suite 770

Coral Gables, FL 33146

juan@fairlawattorney.com

www.fairlawattorney.com

On Mon, Mar 11, 2024 at 9:48 AM Assistant <assistant@lawperez.com> wrote:

Good morning,

We already coordinated the Depositions for Zelmira Quinonez and Aminta Quinonez with Deishaly Morales. Aminta's Deposition is scheduled for April 25, 2024 at 9:00 AM and Zelmira's Deposition is scheduled for April 25, 2024 at 2:00 PM. Attached please find the notices that were provided to us.

Assistant

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, March 14, 2024 11:27 AM
To: Assistant
Cc: Steffany Sanguino; Brooks LaRou, Esq.; Emmanuel Perez; Juan Aragon
Subject: Re: Discovery Answers - Maria Elena Chavez Letona vs. Amor de Jesus, Corp, Jose Machado, Zelmira Quinonez, & Aminta Quinonez 1:23-CV-24299-MORENO/OTAZO-REYES

We'll keep it at 9 to start and see how far we get,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Mar 14, 2024, at 10:16 AM, Assistant <assistant@lawperez.com> wrote:

Good morning,

As you have been informed, On April 15, Mr. Perez has a special set hearing at 1:00 PM. He will be unavailable from 12:00 PM – 2:00 PM. We can start the Deposition at 10:00 AM and if you would like, we can continue Zelmira's Deposition after 2:00 PM.



Kind regards,

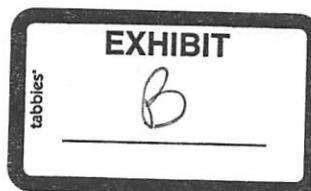
Olivia Reyes

email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com

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Steffany Sanguino <steffany@fairlawattorney.com>

Subject: Re: Maria Elena Chavez Letona vs. Amor de Jesus, Corp, Jose Machado, Zelmira Quinonez, & Aminta Quinonez 1:23-CV-24299-MORENO/OTAZO-REYES - Service of Notice of Deposition

Then we may need more than 3 hours for the depositions of Zelmira and Aminta Quinonez. Please provide additional dates of availability for Zelmira, >*

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Mar 13, 2024, at 9:29 AM, Assistant <assistant@lawperez.com> wrote: >*

Yes, all three deponents need translators.

Kind regards,

Olivia Reyes

email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com

<image001.gif>

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Coral Gables, Florida 33134
Tel. 305.442.7443
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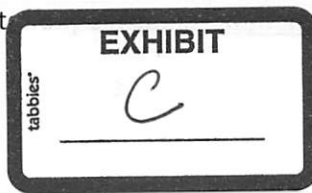
From: Brian Pollock <brian@fairlawattorney.com>

Sent: Wednesday, March 13, 2024 9:24 AM

To: Assistant <assistant@lawperez.com>

Cc: Juan Aragon <juan@fairlawattorney.com>; Brooks LaRou, Esq.

<brooks@fairlawattorney.com>; St <st@fairlawattorney.com>



Assistant

From: Assistant
Sent: Thursday, April 11, 2024 8:40 AM
To: Brian Pollock
Cc: Brooks LaRou, Esq.; Juan Aragon
Subject: CHAVEZ LETONA V. AMOR DE JESUS DEPOSITIONS
Attachments: RENOTICE OF TAKING PLAINTIFF'S DEPOSITION 4.11.24.pdf

Good morning,

Attached please find the Re-Notice of Taking Plaintiff's Deposition.

Since the Plaintiff's Depo has been moved, as requested, Zelmira's Deposition can be rescheduled for April 18 at 1:00 PM, which is when the Plaintiff's Deposition was originally scheduled for.

As previously advised, Zelmira Quinonez is the Rep for Sweet Living Facility and Aminta Quinonez is the Rep for Amor de Jesus. Additionally, as previously informed, all deponents will need translators.

Please advise.

Kind regards,

Olivia Reyes

email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com



901 Ponce De Leon Boulevard
Suite 101
Coral Gables, Florida 33134
Tel. 305.442.7443
Fax: 305.441.9218

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Mr. Pollock,

We have depositions scheduled for both April 18 and April 19, when you are out of town???

We will re-schedule Plaintiff for deposition on April 25, 2024 at 9:00 am, as requested.

Please advise if you will reschedule the deposition that is scheduled for April 15, 2024 for one of the dates provided. If not, I will file a Motion for Protective Order and seek Court Intervention.

Sincerely,

Emmanuel Perez

email: assistant@lawperez.com

E-mail for Service of Pleadings: courtmail@lawperez.com

<image001.gif>

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<image002.jpg> Be environmentally aware - please do not print this e-mail unless you need to.

From: Brian Pollock <brian@fairlawattorney.com>

Sent: Tuesday, April 09, 2024 11:12 AM

To: Assistant <assistant@lawperez.com>

Cc: Juan Aragon <juan@fairlawattorney.com>; Brooks LaRou, Esq. <brooks@fairlawattorney.com>

Subject: Re: CHAVEZ LETONA V. AMOR DE JESUS DEPOSITIONS

Discovery cut-off is April 26, and from the days you offered, I'm out of town on April 18-19. We also asked to depose your clients before ours, so we will need dates before April 18 to take the deposition that needs to be rescheduled, or we'll have to set our client on one of the dates closer to the discovery cut-off (April 25).

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 23-CV-24299 MORENO

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP., JOSE
MACHADO, AND AMINTA QUINONEZ,

Defendants.

RE-NOTICE OF TAKING PLAINTIFF'S DEPOSITON

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition as follows:

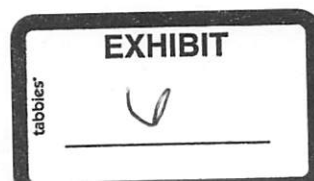
NAME: Maria Elena Chavez Letona
c/o Patrick Brooks LaRou, Esq.
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146

DATE: Thursday, April 25, 2024

TIME: 9:00 AM

PLACE: Via Zoom
<https://ucrinc.zoom.us/j/84083935968?pwd=9gK97Tb8yNe9FzaOayJdoRc1F6IH3k.1>
Meeting ID: 840 8393 5968
Passcode: 066713

Upon oral examination before Universal Court Reporting, Notary Public, or any other notary public or officer authorize by law to take deposition in the State of Florida. The oral and/or videotaped examination will continue from day to day until completed. This deposition is being taken for the purpose of discovery, for use at trial, or such other purposes as are permitted under the rules of Court.



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing pleading has been electronically filed and served to all parties on the service list including Brian H. Pollock, Esq., brian@fairlawattorney.com and Patrick Brooks LaRou, Esq., brooks@fairlawattorney.com via EM/ECF on this 11th day of April 2024.

EMMANUEL PEREZ & ASSOCIATES, P.A.
901 Ponce De Leon Blvd, Suite 101
Coral Gables, FL 33134
Tel. (305)442-7443
eService: courtmail@lawperez.com

By: /s/Emmanuel Perez
EMMANUEL PEREZ
F.B.N. 586552